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Filing date: **02/01/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| | |
|------------------------|--|
| Proceeding | 91212809 |
| Party | Defendant Fiat Group Automobiles S.p.A. |
| Correspondence Address | JOHN A CLIFFORD MERCHANT & GOULD PC PO BOX 2910 MINNEAPOLIS, MN 55402-0910 UNITED STATES jclifford@merchantgould.com, aavery@merchantgould.com, dockm- pls@merchantgould.com |
| Submission | Motion to Suspend for Settlement Discussions |
| Filer's Name | Danielle I. Mattessich |
| Filer's e-mail | jclifford@merchantgould.com, aavery@merchantgould.com, dockm- pls@merchantgould.com |
| Signature | /daniellemattesich/ |
| Date | 02/01/2016 |
| Attachments | 2016 02 01 Motion to Suspend Opposition Proceeding for Settle- ment.PDF(120231 bytes) |

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

| | | |
|--------------------------------|---|-------------------------|
| Sofia Sizzi, |) | |
| |) | |
| Opposer, |) | Opposition No. 91212809 |
| |) | |
| v. |) | |
| |) | Serial No.: 85/678,731 |
| Fiat Group Automobiles S.p.A., |) | Mark: GIULIETTA |
| |) | |
| Applicant. |) | |
| |) | |

MOTION TO SUSPEND OPPOSITION PROCEEDING FOR SETTLEMENT

Respondent/Applicant, Fiat Group Automobiles S.p.A. (“Applicant”) hereby requests that the deadlines set by the Board in this proceeding be extended for a period of sixty (60) days.

It is respectfully submitted that “good cause” exists for the instant request, as the parties have diligently pursued settlement of this matter, have exchanged terms sheets, and have discussed the few outstanding issues that that will enable them to preserve judicial resources. It is anticipated (but of course not guaranteed) that the parties will be able to use the extension period to resolve what appear to be two (2) remaining issues between them. Opposer, Sofia Sizzi (“Opposer”), by and through her attorneys, consents to the instant request, in an effort to resolve the remaining issues.

The parties assert that GOOD CAUSE exists for the granting of this extension, and provide this detailed progress report. Since filing the last extension request on December 30, 2015, counsel for Applicant has sought detailed instructions from Applicant’s counsel in Italy about the few remaining issues that stand in the way of settlement. Also, counsel for Opposer

has been in consultation with Opposer on the same issues. Additional time is needed for the parties work on, and hopefully conclude these negotiations.

Again, while an agreement would be predicated on the acceptance of ALL terms the parties are discussing, the only issues that appears to be outstanding continue to be (a) the mechanism by which the parties might avoid or minimize future issues that may arise from an agreement that might be reached; and (b) relating to this point, finalizing the channels of trade issues that remain outstanding – i.e. issues that might arise from third party (licensee and distributor) use.

Accordingly, the parties respectfully request the below schedule, reflecting a 60-day suspension (which, given that a large foreign entity would need to agree to and sign-off on any agreement that might be reached, is a realistic deadline):

| | |
|---|------------|
| Discovery Closes | 4/1/2016 |
| Plaintiffs' Pretrial Disclosures | 5/16/2016 |
| Plaintiff's 30-day Trial Period Ends | 6/30/2016 |
| Defendant's Pretrial Disclosures | 7/15/2016 |
| Defendants' 30-day Trial Period Ends | 8/29/2016 |
| Plaintiff's Rebuttal Disclosures | 9/13/2016 |
| Plaintiff's 15-day Rebuttal Period Ends | 10/13/2016 |

Prompt approval is earnestly solicited and it is respectfully submitted that good cause for the instant request exist.

Respectfully submitted,

Fiat Group Automobiles S.p.A,

By its attorneys,



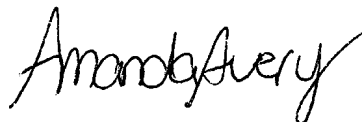
Date: 02/01/2016

John A. Clifford
MERCHANT & GOULD P.C.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **MOTION TO SUSPEND
OPPOSITION PROCEEDING FOR SETTLEMENT** was served, via first-class mail, postage
prepaid this 1st day of February 2016.

Zeynel Karcioglu
JACOBS & BURLEIGH LLP
1290 Avenue of the Americas, 30th Fl
New York, NY 10022

A handwritten signature in black ink that reads "Amanda Avery". The signature is written in a cursive, flowing style.

Amanda Avery